

**Plaintiff's Synopsis of
Veerle Snyers Deposition Designations**

Veerle Snyers ("Snyers") began working at Antwerp Diamond Bank N.V. ("ADB") in August 2001. She is a Belgian lawyer with no specialized training in banking. Snyers Tr. at 23:10-24:15. She has no firsthand knowledge of events involving Lazare that took place prior to starting her employment with ADB Id. at 104:03-23, 11:21-13:15, 29:14-30:01, 238:14-241:03. She was not employed at ADB at the time that she contends a bank account was opened for Lazare at ADB. Id. at 55:25-58:05. Snyers never helped a client to set up a bank account, and does not know the procedures for doing so in 2000-2001 Id. at 41:10-24, 250:23-251:01, 252:01-256:10. She is not aware of any law requiring a borrower to open a bank account in Belgium, nor is she aware of anyone informing Lazare of ADB's purported "custom and practice" of opening bank accounts at ADB for customers with credit facilities, much less with accounts at KBC NY. Id. at 241:04-242:23, 244:18-249:01.

Snyers submitted four declarations in support of Defendants' motions to dismiss. Id. at 306:13-312:07. Snyers's declarations (i) are not all based on firsthand knowledge; (ii) were prepared based on a review of Lazare's credit file, but without knowing if the file was complete; (iii) include words and phrases which Snyers does not know the meaning of; and (iv) were prepared without her remembering how she satisfied herself that it was true or accurate. Id. at 161:08-164:20, 30:25-32:21, 204:01-209:08, 32:22-38:03, 211:16-215:11. Snyers's did not draft her declarations, as they were drafted by Cynthia Okrent and Helen Gredd. Id. at 306:13-312:07.

Snyers does not understand how Lazare's bank account at KBC's New York branch ("KBC-NY") operated, wasn't aware of that bank account until 2012 (after submitting her first sworn declaration to the Court), and has no independent knowledge of the activity in that bank account. Id. at 97:16-100:09, 152:2-25, 159:09-161:01, 190:03-08, 188:18-189:13, 190:09-191:21. She does not know how Lazare repaid monies borrowed under its credit facility, and does not understand the mechanism by which funds were purportedly swept from Lazare's bank account at KBC-NY into a purported bank account at ADB. Id. at 194:23-196:04, 196:14-203:04, 62:01-68:23. Snyers has no knowledge of what a pooling account is or if ADB had one. Id. at 157:19-158:13, 196:14-203:04. She does not know the purpose of SWIFT messages, what a book transfer is, or how clearing works. Id. at 155:11-156:07, 161:02-07, 165:12-14. ADB's diamond clients' transactions were in dollars, but Snyers does not know how international dollar transactions are effectuated. Id. at 170:02-171:02, 171:09-22, 171:23-172:05.

Snyers admits that, contrary to her sworn declarations, she does not know how, at the end of the day, KBC-NY swept funds (whether positive or negative) from Lazare's KBC-NY Bank Account. Id. at 196:14-203:04, 204:01-209:08.